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11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13
14 UNITED STATES OF AMERICA,
v.
APPROXIMATELY \$37,000.00 IN
U.S. CURRENCY,
Defendant.

15 2:20-MC-00314-TLN-DB

16 STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Kera
18 Barber (“claimant”), by and through their respective counsel, as follows:

19 1. On or about September 25, 2020, claimant filed a claim in the administrative forfeiture
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
21 \$37,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on July 24, 2020.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim
25 to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
2 That deadline was December 24, 2020.

3 4. By Stipulation and Order filed December 17, 2020, the parties stipulated to extend to
4 February 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
6 to forfeiture.

7 5. By Stipulation and Order filed February 12, 2021, the parties stipulated to extend to March
8 24, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. By Stipulation and Order filed March 23, 2021, the parties stipulated to extend to May 24,
12 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
14 forfeiture.

15 7. By Stipulation and Order filed May 20, 2021, the parties stipulated to extend to June 23,
16 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
18 forfeiture.

19 8. By Stipulation and Order filed June 22, 2021, the parties stipulated to extend to August 23,
20 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
21 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
22 forfeiture.

23 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to October
24 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
25 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
26 forfeiture.

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1 10. Accordingly, the parties agree that the deadline by which the United States shall be required
2 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
3 the defendant currency is subject to forfeiture shall be extended to October 22, 2021.

4 Dated: 8/19/21

PHILLIP A. TALBERT
Acting United States Attorney

6 By: /s/ Kevin C. Khasigian
7 KEVIN C. KHASIGIAN
Assistant United States Attorney

9 Dated: 8/19/21

10 /s/ Jacek Lentz
11 JACEK LENTZ
12 Attorney for potential claimant
13 Kera Barber
14 (Signature authorized by email)

15 **IT IS SO ORDERED.**

16 Dated: August 19, 2021

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18 Troy L. Nunley
19 United States District Judge